



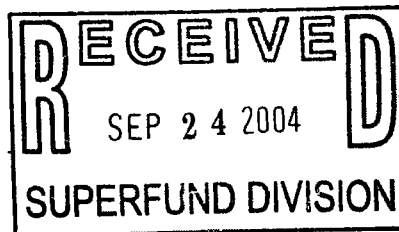
# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

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Commissioner

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September 20, 2004

Mr. Bharat Mathur  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 W. Jackson Boulevard  
Chicago, Illinois 60604-3507



Dear Mr. Mathur:

Re: Record of Decision (ROD) Amendment  
Himco Dump Superfund Site  
Elkhart, Indiana

The Indiana Department of Environmental Management (IDEM) has reviewed the U.S. Environmental Protection Agency's (US EPA's) ROD Amendment for the Himco Dump Superfund site. IDEM is in full concurrence with the major components of the selected remedy outlined in the document, which include:

#### Groundwater

- Establish institutional controls east and south of the landfill that prohibit installation of new wells.
- Provide municipal connections to 39 selected homes, and establish a sentinel monitoring program that will allow for expansion of municipal connections if needed.
- Establish new groundwater monitoring wells at the boundary of the landfill; monitor for a minimum of ten years, quarterly for the first two years and semiannually thereafter.
- Properly abandon open drinking water wells for those residences south and east of the landfill that have been provided municipal connections.
- Conduct a pre-design investigation to establish the horizontal and vertical extent of groundwater contamination at the landfill.

#### Construction Debris Area (CDA)

- Remove all surface debris and rubble.
- Excavate residential parcels in 2-foot lifts until Remedial Action Objectives are met, or until 6-feet below ground surface; backfill and restore property; or, cover the CDA materials in place with a minimum of 18-inches of soil and fence the area as part of the landfill, and establish institutional controls in parallel with the landfill.

- Excavated material may be consolidated and covered on commercial Parcel F, or sent to an appropriate disposal facility.

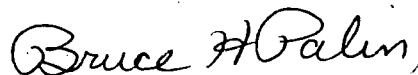
Landfill Property

- Conduct a pre-design investigation that would characterize on-site soils (depth, nutrients, vegetation, grain size, etc.) in order to determine need for additional cover.
- Remove and dispose of on-site surface debris.
- Cover areas of exposed waste and in-fill surface voids with clean soil and suitable vegetation; grade the soil cover for proper drainage and erosion protection. It is anticipated that at least an 18-inch soil depth will be necessary to maintain vegetation and prevent exposure to on-site soils.
- Grade the total cover to no less than a two percent slope to allow for proper drainage.
- Install a landfill gas collection and treatment system capable of collecting and treating all gases generated by the landfill. The landfill gas collection and treatment system shall, at a minimum, comply with all standards and requirements of 326 IAC 1-3, and shall include, as necessary, a vapor phase carbon collection and treatment system and an enclosed ground flare system.
- Implement institutional controls that will prohibit installation of wells and excavation into the landfill cover.
- Fence landfill area until the site can be redeveloped.

IDEM staff agrees that the selected remedy is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action, and is cost effective. IDEM staff has been working closely with Region V staff in the selection of an appropriate remedy, and is satisfied with the selected alternative.

Please be assured that IDEM is committed to accomplish cleanup at all Indiana sites on the National Priorities List, and intends to fulfill all obligations required by law to achieve that goal. We look forward to beginning work on this project.

Sincerely,



Bruce H Palin  
Deputy Assistant Commissioner  
Office of Land Quality

BHP:JHF:tr:jts

cc: Bruce Oertel  
Rex Osborn  
Jessica Huxhold Fliss